

Donnelly, Jack W

From: Donnelly, Jack W
Sent: Wednesday, August 24, 2005 11:01 AM
To: 'Einan.David@epamail.epa.gov'; Zeisloft, Jamie
Cc: Miller, Larry R (Rex)
Subject: Horseshoe Landfill (Update and next sampling approach)

Attachments: Phase III Strategy.doc

Good morning Mr Einan:

As we discussed yesterday, attached is the sample data from the last sampling effort, the next steps for additional excavation and sampling. Thanks for concurring with the approach outlined. We are performing the additional excavation today and will sample tomorrow most likely. We will keep you posted when the data arrive.

Also, the Letter to File, WM Plan, and sampling instructions and additional sampling strategies have been placed in the admin record. Thanks.



Phase III
Strategy.doc (36 KB).

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Horseshoe Landfill - Results of Phase II Sampling

Phase II Sample Results

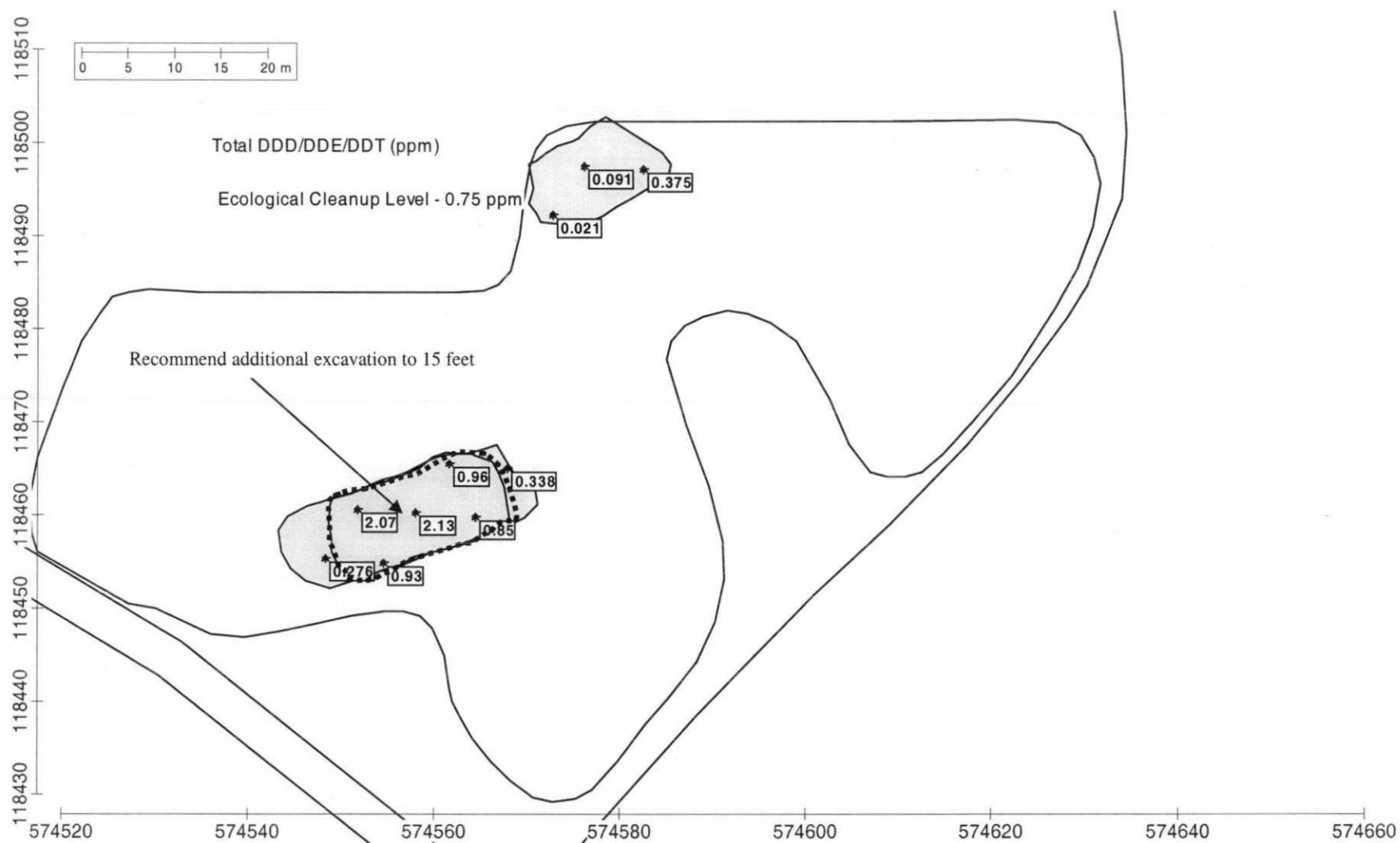
Phase II sample results for the additional excavation of the two localized contamination areas indicate the southern location exceeds the ecological cleanup criteria of 0.75 mg/kg for total DDD/DDT/DDE. The attached figure shows the areas that were excavated as part of Phase II to a depth of 6 feet with the locations of the Phase II samples and the associated DDT/DDD/DDE soil concentrations. As shown, the sample results indicate that the northern location meets the cleanup criteria and that a portion of the southern location requires additional remediation.

Considering the cost of performing additional phases of mobilizing equipment for excavation and repetitive sampling and analysis, a cost effective approach is planned to excavate the localized contamination in the southern location an additional 9 feet to an overall depth of at least 15 feet. According to WAC-173-340-7490(4)(b), the 15 foot depth "represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of site developmental activities, resulting in exposure to ecological receptors". Otherwise without additional excavation, institutional controls would be required to implement a conditional point of compliance at the biologically active soil zone of 6 foot depth. The additional excavation to at least 15 feet to remove this localized contamination would eliminate the pathway for site development and ecological receptors.

Proposed Strategy

Additional excavation in the southern location will be performed to a depth just below 15 feet to remove the residual DDT/DDD/DDE contaminated soil. The additional excavation will be performed in the area as delineated by the Phase II samples results and shown in the attached figure. After the excavation is completed, Phase III sampling will be performed at the base of this additional excavation to evaluate the residual concentration of DDD/DDT/DDE. Soil sampling will be performed as follows:

1. After the excavation is at a depth just below 15 feet (as determined from the original surface elevation) the area at the base of the excavation will be divided into two sample areas of approximately equal size.
2. For each sample area, the bucket of the excavator will be used to scrape and remove an additional 1 foot layer of soil from the base of the excavation and place in a separate stockpile, resulting in two soil stockpiles, one for each sample area.
3. For each stockpile, 30 aliquots of soil will be collected from the surface of the stockpile and combined into one soil sample for a total of two soil samples. The sampler will use their discretion to select the locations for the soil aliquots such that they provide adequate coverage over the surface area of the stockpile.
4. Each soil sample will be analyzed for DDT/DDD/DDE using EPA method 8081. No field quality control samples will be collected because this was performed during Phase I sampling.



Isom, Debra A (Debbi)

From: Zeisloft, Jamie
Sent: Wednesday, September 28, 2005 3:34 PM
To: Isom, Debra A (Debbi)
Cc: Donnelly, Jack W; Wilcox, Debra
Subject: Additional Info/1100 Area Admin Record

Debbi,

As with the recent 1100 Area Memo-to File and Waste Management Plan, we need to put documentation pertaining the recent Horseshoe Landfill remediation into the admin record. Jack references the additional documentation in his message below. We (RL) authorize that placement of this documentation into the admin record, along with a soon-to-be generated Horseshoe Landfill Close-Out Report. Thanks.

Jamie

From: Donnelly, Jack W
Sent: Monday, September 26, 2005 1:41 PM
To: Zeisloft, Jamie
Cc: Isom, Debra A (Debbi)
Subject: FW: 1100 Area Admin Record

Good afternoon Jamie:

Can you please send an email to Debra Isom to allow me to place the phase III sampling approach and results in the admin. Record. Thanks.

Debbie: The OU is 1100-IU-1 just like before when I brought over other items a few months ago. Thanks.

From: Isom, Debra A (Debbi)
Sent: Monday, September 26, 2005 12:48 PM
To: Donnelly, Jack W
Subject: RE: 1100 Area Admin Record

We need DOE's (or EPA/Ecology) authorization to put this into the AR. I also need what Operable Units it applies to.

Thanks, Debbi

From: Donnelly, Jack W
Sent: Monday, September 26, 2005 12:19 PM
To: Isom, Debra A (Debbi)
Subject: 1100 Area Admin Record

Good afternoon Debbie:

I have two other items to put in the admin record for the horseshoe landfill.....it's a clarification on the sampling and a summary of the results. Do I need DOE to send you an email authorizing this, or can I just put it in plant mail and have it sent to you. Please let me know. Thanks. There is only going to be one more item place in it which will be a final report issued in the next 4 months. Thanks.